

AUSA: Nee

Telephone: 810.766.5177

AO 91 (Rev. 08/09) Criminal Complaint

Task Force Officer: Zapolski

Telephone: 810.239.5775

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Clark Avery Squires

Case: 4:19-mj-30486

Judge: Hluchaniuk, Michael J.

Filed: 09-12-2019

SEALED MATTER (TH)

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of November 30, 2018 to September 4, 2019, in the county of Genesee
in the Eastern District of Michigan, the defendant(s) violated:

Code Section

Title 18 U.S.C. §§ 2251(a) and 2251(b)

Offense Description

Production of child pornography

This criminal complaint is based on these facts:

On or about November 30, 2018 to on or about September 4, 2019, in the Eastern District of Michigan, defendant knowingly produced child pornography, in violation of Title 18 U.S.C. §§ 2251(a) and 2251(b).



Continued on the attached sheet.

*Complainant's signature*Evan Zapolski, TFO - FBI*Printed name and title*

Sworn to before me and signed in my presence.

Date: September 12, 2019*Judge's signature*City and state: Flint, MichiganMichael Hluchaniuk, U. S. Magistrate Judge*Printed name and title*

COMPLAINT AFFIDAVIT

I, Evan Zapolski, being duly sworn, state:

1. I am employed as a Detective Trooper (D/Tpr.) with the Michigan State Police (MSP) and a Task Force Officer (TFO) of the Federal Bureau of Investigation (FBI), and have been so employed since May 2013. I have been assigned to the Michigan State Police Internet Crimes Against Children Taskforce since February 2017, and have been a Task Force Officer with the FBI'S Northeast Michigan Trafficking & Exploitation Crimes Taskforce since March 2019. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have been involved with several investigations regarding child pornography and the exploitation of children through the internet.
2. This Affidavit is submitted in support of a complaint and arrest warrant for Clark Avery Squires. It is my opinion there exists probable cause to believe Squires has violated Title 18 U.S.C. § 2251 (Production of Child Pornography). This Affidavit is intended to show only sufficient probable cause for the requested order and does not set forth all of my knowledge about this matter. In addition, the information contained in this affidavit is

based on personal knowledge, training and experience, and on information made available to me by other law enforcement officers.

3. In October and November of 2018, multiple cyber-tips (42121488, 42513463, 42606361) were received by the National Center for Missing and Exploited Children (NCMEC), submitted by Google. The cyber-tips were submitted by Google and reported that the user account, devildog6662008@gmail.com, Clark Squires, Phone: 734-829-7253, was in possession of eight (8) image files that depicted animated child sexually abusive materials, a violation of MCL 750.145C.
4. Detective Sergeant (D/Sgt.) David Vergison, MSP, reviewed the submitted files provided by Google and confirmed the images to depict animated adults and children engaged in sexual activity.
5. D/Sgt. Vergison executed a State of Michigan, 67th District Court, search warrant to Verizon Wireless, for account subscriber information related to the reported phone number, 734-829-7253. Verizon Wireless confirmed this phone number to be registered to Clark Squires, 1105 Woodknoll Drive, Flint (Mundy Twp.), Michigan.
6. On 9-5-19, a State of Michigan, 67th District Court, search warrant was executed to the residence of Clark Squires, 1105 Woodknoll Drive, Flint, Michigan. During the search warrant, a cell phone was located in the

nightstand drawer of the master bedroom. Clark Squires, during his non-custodial interview with D/Sgt. Vergison, admitted to this Samsung (model: SM-G973U) cell phone being his. This phone was found to be factory reset, to which Clark also admitted to doing as officers made entry into the home.

7. During the interview with Clark, he further admitted to viewing, sending and receiving child pornography.
8. D/Sgt. Vergison conducted a forensic examination of the G.SKILL-brand 64 gigabyte memory card contained within the seized cell phone. Located on the memory card were images and videos depicting Clark and a 2.5 year old child female child, known to Clark Squires.
9. The three (3) images, which are dated November 30, 2018, depict Clark sitting on a couch with an erect penis protruding from his pants. A small female child is laying on his lap. Clark is identified as being the male in the photo by his wife. His wife identified the shirt the male is wearing to be a shirt owned by Clark. The EXIF data contained within the photos places the GPS location of the photos to be on Jason Drive. Clark and his wife's previous residence is 24753 Jason Dr., Brownstown, Wayne County, Michigan. Data associated with the images shows that they were created with a Samsung cellular phone, model SM-G965U.
10. Two (2) of the videos, which are dated September 4, 2019, depict Clark,


who is identified by his voice, sitting in a chair with an erect penis. A female child is standing near him and Clark is heard saying “give it a kiss,” but the child does not. An additional video depicts the same female child seated on a table, with only a shirt on. Clark opens the legs of the child to expose her vagina and focuses the camera on her genitalia. The videos were captured at Clark’s current residence, as identified by D/Sgt. Vergison. During the search warrant, photos were taken of the residence which depict the same residence that is in the videos, 1105 Woodknoll Drive, Flint, Genesee County, Michigan.

11. The company, Samsung, is headquartered outside of the United States and both the cell phone seized in the search and the cell phone with which the images were created were manufactured outside of the State of Michigan.

12. Based upon the foregoing information, it is my opinion that probable cause exists that Squires has violated Title 18 U.S.C. §§ 2251(a) and 2251(b) (Production of Child Pornography). Squires is a parent who permitted his minor to engage in sexually explicit conduct for the purpose of visual depiction of that conduct in violation of 18 U.S.C. § 2251(b) and used a minor to engage in sexually explicit conduct for producing a visual depiction of that conduct in violation of 18 U.S.C. § 2251(a). The violations of those statutes occurred on November 30, 2018, and September 4, 2019, respectively. Accordingly, I ask the court to issue a criminal complaint and arrest warrant for Clark Avery Squires for that offense.


Dated the 12th day of September, 2019, at Flint,

Michigan.



Evan Zapolski
Federal Bureau of Investigations TFO/TPR

Subscribed and sworn to before me this 15th day of
September, 2019.



Michael Hluchaniuk
United States Magistrate Judge